

Exhibit "3"



CULPEPPER IP, LLLC

ATTORNEY AT LAW

75-170 HUALALAI ROAD, SUITE B204
KAILUA-KONA, HAWAII 96740

TEL: (808) 464-4047
FAX: (202) 204-5181

WWW.CULPEPPERIP.COM

PATENTS, TRADEMARKS & COPYRIGHTS

E-mail< datacamp@datacamp.co.uk>

March 15, 2021

Via Air Mail

DataCamp Limited
207 Regent Street, Third Floor
London, United Kingdom W1B 3HH

Re: Rampant piracy at Internet Protocol (“IP”) addresses including but not limited to
89.187.164.179, 89.187.171.116, 89.187.182.111, and 156.146.50.1

My Reference Number: 20-0231B

Dear Sir or Madam,

My law firm represents Rambo V Productions Inc., Fallen Productions Inc., HB Productions Inc.; Venice PI LLC; Definition Delaware LLC; Voltage Holdings LLC; Hunter Killer Productions Inc.; LHF Productions Inc.; and Bodyguard Productions Inc., the owners of the copyright protected motion pictures Rambo V: Last Blood, Angel Has Fallen, Hellboy, Once Upon a Time in Venice, The Professor and the Madman, Extremely Shockingly Evil and Vile, Hunter Killer, London Has Fallen, and The Hitman’s Bodyguard.

My clients’ agent has sent over 78,500 infringement notices (“Notices”) styled per the Digital Millennium Copyright Act (“DMCA”) to DataCamp, Ltd. (“DC”) at the email address abuse@cdn77.com – the email address DC indicates as the appropriate abuse contact in the ARIN Whois records. One such exemplary Notice is attached to this letter as Exhibit “1”. However, it appears that DC has failed to terminate any repeat infringers or take any meaningful actions despite DC receiving numerous, consistent DMCA notices.

To illustrate a concrete example of the damage done to our clients, in the month of July, 2020 alone, the owners’ agent sent 35 Notices regarding confirmed infringements of the owners’ motion pictures at the IP address 89.187.164.179. However, DC failed to terminate this account or take any meaningful steps to prevent continuing infringing activity. Examples of other IP addresses and the number of notices sent is provided below:

IP Address	Notices Sent
89.187.164.179	1446
89.187.171.116	515
89.187.182.111	511
156.146.50.1	484
156.146.50.134	456
156.146.50.65	450

DC may not qualify for safe harbor

The DMCA provides a safe harbor for qualified services providers from liability from copyright infringement. However, one requirement for this safe harbor is that the service provider have a registered DMCA agent, which DC has failed to register. *See 17 USC 512(c)(2).*

A further requirement for safe harbor is that the service provider adopt and reasonably implement, and inform subscribers and account holders of the service provider's system or network of, a policy that provides for the **termination** in appropriate circumstances of subscribers and account holders of the service provider's system or network who are repeat infringers. *See 17 USC 512(i)(1)(A).* As discussed above, my clients' agent sent over 78,500 infringement notices to DC concerning over 6,200 IP addresses requesting DC to take action. The example attached in Exhibit "1" provides a notice for the IP address 89.187.164.179 ("179 address"). Solely for the 179 address, over 1,400 infringement notifications were sent.

Accordingly, DC fails to qualify for a safe harbor because (a) DC had actual knowledge that it was providing IP addresses that linked users to online locations containing infringing material and has no registered DMCA agent, and (b) DC has not terminated the subscribers' accounts despite the multiple notifications sent by my clients' agent.

Nearly all of the file titles of the infringing copies of my clients' Works have had the copyright management information ("CMI") such as the title of the Work modified or altered to falsely include a reference to a piracy website. For example, the infringing file my clients' agent told you about in the Notice shown in Exhibit "1" has the title: "Rambo Last Blood (2019) [BluRay] [720p] [YTS.LT]". The CMI has been modified/alterred to falsely refer to the notorious piracy websites YTS in violation of 17 U.S.C. §1202 ("DMCA violations"). My clients did not provide file titles that promote movie piracy websites.

Accordingly, my clients and I believe that DC may be liable for these infringements of my clients' copyrights in violation of federal law under the Copyright Act, 17 U.S.C. § 501. Remedies available to my clients include: an injunction against further infringement; actual and statutory damages of up to \$150,000/motion picture; and costs and attorney's fees.

Further, my clients and I believe that DC may be secondarily liable for its subscribers' infringements of my clients' copyrights in violation of federal law under the Copyright Act, 17 USC §501. My clients and I also believe that DC may be secondarily liable for its subscribers'

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DMCA violations under 17 U.S.C. § 1202. Remedies provided by 17 U.S.C. § 1203(c) include statutory damages up to \$25,000 per DMCA violation. For example, above I illustrated an example of a DMCA violations (YTS).

Nonetheless, my clients would like to resolve this issue outside of litigation if possible. To do so, we request that: (1) DC agrees to immediately terminate all Internet service to the subscribers at the above IP addresses; (2) DC agrees to take the appropriate action to terminate subscriber accounts in response to all further copyright notifications received from my clients' agent; (3) DC agrees to provide customer identification information for the IP addresses where my clients' agent has confirmed infringements; (4) DC mandate that its subscribers block/ access to notorious piracy websites listed in The Office of the United States Trade Representative (USTR) yearly list of Notorious Markets for Counterfeiting and Piracy such as The Piratebay, Popcorn Time and YTS; and (5) DC agrees pay a portion of my clients' damages.

I look forward to receiving your affirmative response that you desire to fully comply with the above-stated requests by April 16, 2021 so that we can discuss this issue further. My clients would like to resolve this matter amicably but will consider any and all legal action necessary to protect their valuable intellectual property rights under federal and state law.

This letter is written without prejudice to the rights and remedies of our client, all of which are expressly reserved.

Sincerely,



Kerry S. Culpepper

kculpepper@culpepperip.com

Attachment: Exhibit 1

joshua.lee@culpepperip.com

From: notice@dmcagateway.com
Sent: Wednesday, February 17, 2021 10:10 PM
To: abuse@cdn77.com
Subject: Notice of Claimed Infringement [Case No. 44238526840]

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA256

Notice of Claimed Infringement

Notice ID: 44238526840

Notice Date: 2021-02-18 08:09:43

Dear Sir or Madam:

This message is sent on behalf of Rambo V Productions, Inc..

Under penalty of perjury, I assert that PML Process Management Ltd. is authorized to act on behalf of the owner of the exclusive copyrights that are alleged to be infringed herein.

Rambo V Productions, Inc. owns the copyrights to the movie Rambo: Last Blood. The unauthorized download and distribution of this file by your IP address constitutes copyright infringement.

Please see below details for the infringements:

Protocol: BITTORRENT

Infringed Work: Rambo: Last Blood

Infringing FileName: Rambo Last Blood (2019) [BluRay] [720p] [YTS.LT] Infringing FileSize: 953581534

Infringer's IP Address: 89.187.164.179 Infringer's Port: 50406 Initial Infringement Timestamp: 2021-02-17 04:52:26

And, you're also creating a security risk on your computers, devices and networks when you download unauthorized movies or allow others to do so from your Internet connection.

We respectfully ask that you stop infringing and redistributing Rambo V Productions, Inc. copyright protected content, and take the proper steps to secure your Internet so that others do not infringe and redistribute our content as well.

We have a good faith belief that use of the copyrighted material detailed above is not authorized by the copyright owner, its agent, or the law. In addition, we have a good faith subjective belief that the use does not constitute fair use. The information in this notice is accurate and we state, under penalty of perjury, that we are authorized to act on behalf of the owner of the copyright that is allegedly infringed. This letter is not a complete statement of Rambo V Productions, Inc.'s rights in connection with this matter, and nothing contained herein constitutes an express or implied waiver of any rights or remedies of Rambo V Productions, Inc. in connection with this matter, all of which are expressly reserved.

We appreciate your assistance and thank you for your cooperation in this matter.

Respectfully,

Catherine Hyde
PML Process Management Ltd.
notice@dmcagateway.com
Address:
Lordou Vylonos, 61-63, Floor 5
Larnaca 6023
Cyprus

```
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        <Contact>Catherine Hyde</Contact>
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        <Email>notice@dmcagateway.com</Email>
    </Complainant>
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        <Email>abuse@cdn77.com</Email>
    </Service_Provider>
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            <Type>Movie</Type>
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        </Item>
    </Content>
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-----BEGIN PGP SIGNATURE-----
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